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U S NAVY RESPONSES TO U S EPA REGION IV AND FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION COMMENTS ON THE DRAFT SITE INVESTIGATION  
REPORT FOR POTENTIAL SOURCE OF CONTAMINATION 55 NAS JACKSONVILLE FL

4/16/2013  
TETRA TECH



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April 16, 2013

Project Number 112G02686

Ms. Adrienne Wilson  
Remedial Project Manager  
Code OPDE3/AW  
Department of the Navy  
Naval Facilities Southeast  
Ajax Street, Building 135N  
NAS Jacksonville, Florida 32212-0030

Reference: CLEAN V Contract Number N62470-08-D-1001  
Contract Task Order Number JM19

Subject: Response to Comments for the Draft, Revision 0, Site Investigation Report,  
Potential Source of Contamination 55, Naval Air Station Jacksonville, Florida

Dear Ms. Wilson:

Tetra Tech is pleased to submit this letter responding to the comments on the Draft Site Investigation Report for Potential Source of Contamination 55 (Revision 0) received from the Naval Air Station (NAS) Jacksonville Partnering Team members. This report was submitted to the partnering team August 31, 2012. The questions and/or comments that have been received by Tetra Tech from the NAS Jacksonville Partnering Team members are addressed below.

### **Naval Facilities Engineering Command Southeast**

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#### **Adrienne Wilson**

**Comment:** Section 2.3.2 is conflicting since it is titled mobile lab but within the paragraph it discusses sending sample off to a lab. Please clarify.

**Response:** The title of Section 2.3.2 has been changed to "Groundwater Samples Laboratory Analysis."

**Comment:** I added a comma between metals and SVOCs—in the 1<sup>st</sup> paragraph of Section 5 recommendations.

**Response:** A comma has been added between metals and SVOCs—in the 1<sup>st</sup> paragraph of Section 5 recommendations.

**Comment:** Since we have determined we have contamination shouldn't the recommendation include moving forward to the RI???

**Response:** Tetra Tech will revise the recommendation section of the report to include PSC 55 within the boundary of PSC 8, in which, further delineation sampling and possible RI activities could occur.

**Tetra Tech, Inc.**

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## Naval Air Station Jacksonville, Facilities and Environmental Department

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### Tim Curtin

A markup pdf of the report was received by Tim Curtin. Changes were made to the text as edited in the file provided by Tim Curtin. Comments inserted into the file are as follows:

**Comment:** Page ES-3, paragraph before Table ES-1 – sentence reads: “The ecological receptors associated with PSC 55 have limited to no contact with groundwater.” – Tim’s comment “What are you trying to say?”

**Response:** Tetra Tech agrees and will remove the sentence from the report.

**Comment:** Figure 1-2 – “Put building number of the map”

**Response:** Figure has been revised to include the building number.

**Comment:** Page 1-3, Section 1.4, last paragraph, text reads “Based on information provided on the United States Geological Survey (USGS) Orange Par, Florida 7.5-minute quadrangle (USGS, 1993), surface elevation at the site ranges from 2 to 5 feet above msl (see Figure 1-3).” Tim’s comment “Seems low. Clearly some of the berms at the site are taller than 5 feet.”

**Response:** Tetra Tech agrees the berms are taller than 5 feet, but actual sampling locations at the site are within the bermed areas (2 to 5 feet above msl). The following text has been added to Section 1.4 “*The sludge within PSC 55 is contained to the north, west and south by a berm (approximately 5 to 10 feet above msl) and to the east by the St. Johns River, The area inside the berm is virtually flat with a gentle slope to the east.*”

**Comment:** Section 2.3.1 – text reads “Ten temporary wells were installed in accordance with standard operating procedures presented in the SAP (Tetra Tech, 2011) during the period from August 3, 2011... These wells were install to depths ranging from 9.5 to 10 feet bls... Tim’s comment: “Are these temporary wells still there?”

**Response:** Tetra Tech removed the temporary wells after sampling was completed.

**Comment:** Section 2.3.2 – Section title reads “Groundwater Samples Mobile Laboratory Analysis” Tim Curtin’s comment “Why are you shipping samples to a mobile lab?”

**Response:** the words “Mobile Laboratory” were removed from Section 2.3.2 title.

**Comment:** Section 3.1.1 – text reads “Clay fine sand with varying amounts of sludge or dredge material is reported to lie from 2 to 9 feet bls.” Tim Curtin’s comment “Did you observe this or are you referring to another report which needs a reference?”

**Response:** Yes and the boring logs are provided in Appendix C.

## United States Environmental Protection Agency

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### Pete Dao

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Site Investigation Report. EPA concurs with the recommendation for additional sampling, and is approving the document as final.

## Florida Department of Environmental Protection

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### David Grabka

**Comment:** The number of chemicals of potential concern (COPCs) detected in either surface/subsurface soil or groundwater above human health project action limits (PALs) is quite limited. I would propose that the Navy limit further horizontal and vertical delineation efforts to only those COPCs that were identified as exceeding human health PALs in the Site Investigation (see Table 3-1). This would focus further assessment and analyses to a select group of metals and would eliminate the expense of collecting samples for laboratory analysis for volatile organic compounds, semi-volatile organic compounds and polychlorinated biphenyls.

**Response:** Tetra Tech agrees with the comment and will develop an additional round of sampling based on the limited number of COPCs identified with the site to try and delineate vertical and horizontal extent. This sampling will be conducted as part of the extended site investigation at PSC 8.

**Comment:** Because contamination above PALs has been identified at PSC 55 and documented in the Site Investigation Report, further work at the site should be conducted pursuant to the NAS Jacksonville Federal Facilities Agreement. Upon EPA and Department approval of the Site Investigation Report, please provide a schedule of future planned activities for PSC 55 beginning with the Remedial Investigation Work Plan.

**Response:** The Navy gained approval for PSC 55 to be incorporated into the LUC Sites with No RODs task associated with PSC 8 (and multiple PSC sites). The two PSC sites are located adjacent to each other and contain similar sludge material from the base. A schedule of future planned assessment and remediation activities for PSC8/55 will be included in the Remedial Investigation and Feasibility Study for the LUC Sites with no ROD.

**Comment:** On page 3-1, Table 3-1, most of the metals are denoted as exceeding their ecological soil PALs. This includes metals such as aluminum, calcium, iron, magnesium, manganese, and sodium. I am not aware that those metals are typically of ecological concern. Please identify how ecological soil PAL exceedances were calculated for metals. Could some of the exceedances indicate that the metals are detected above NAS Jacksonville background concentrations rather than exceeding an EPA ecological screening value?

**Response:** The ecological soil PAL exceedances were calculated by comparing the detected soil concentrations with the ecological PAL. A summary of these comparisons is presented in Table 3-4.



The ecological PAL is the lower of the Ecological Soil Screening Level (Eco-SSL) or the Region 4 Ecological Soil Screening Values (ESVs) unless the NAS Jacksonville Background Surface Soil Concentration is greater than the lower of these two criteria. Then the ecological PAL is the NAS Jacksonville Background concentration.

The Eco-SSL is the lowest screening concentration for plants, soil invertebrates, birds and mammals (for ecological receptors screening) (USEPA, 2005). The ESV is the Region 4 Ecological Soil Screening Values (ESVs) for soil (for ecological receptors screening) (USEPA, 2001).

If you have any questions regarding the enclosed material, or if I can be of assistance in any way, please contact me at (904) 730-4669, extension 213, or by e-mail at [Mark.Peterson@tetrattech.com](mailto:Mark.Peterson@tetrattech.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark A. Peterson'.

Mark A. Peterson  
Task Order Manager

Enclosure

c: Tim Curtin, NAS Jacksonville  
Pete Dao, USEPA  
David Grabka/Jennifer Conklin, FDEP  
John Trepanowski, Tetra Tech (cover letter only)  
CTO JM19 Project File